



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 28, 2013

Ms. Jessica Goldberg
Regulatory Affairs Specialist
WPC Brands, Inc.
P.O. Box 4406
Bridgeton, MO 63044-0406

**Subject: Amended Labeling; Acceptance of Revised CSFs & Addition of New Marketing Statements
Repel 25 INSECT REPELLENT, EPA Reg. No. 305-51
Your Submission Dated October 3, 2012**

Dear Ms. Goldberg:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable.

Copies of your label stamped "Accepted" as well as the efficacy and product chemistry reviews that were completed in support of this amendment are enclosed for your records. If you have any questions about this label review, please contact Mr. Carmen J. Rodia, Jr. at (703) 306-0327 or via e-mail at Rodia.Carmen@epa.gov.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Richard J. Gebken".

Richard J. Gebken,
Product Manager (10)
Insecticide Branch
Registration Division (7504P)

Enclosures: *Label Stamped "Accepted," dated March 28, 2013*
Efficacy Review, dated March 27, 2013
Product Chemistry Review, dated February 25, 2013

000305-00051 D470609

Front Panel

Repel 25

Insect Repellent

(either in name or stated separately)

[Unscented • Long lasting protection • From mosquitoes, ticks, biting flies, gnats, chiggers, no-see-ums and fleas • Makes you invisible to bugs • It won't stain • Not greasy or oily • Makes You Invisible to Bugs • Tough on bugs • Effective, dependable protection • Pleasant, effective protection • Repels mosquitoes, chiggers, ticks, biting flies, no-see-ums, gnats and fleas • Repels biting insects for hours • Pleasant, effective protection from mosquitoes, chiggers, ticks, biting flies, no-see-ums, gnats and fleas • with Extender • Lasts up to 10 [8] hours against mosquitoes • Provides up to 10 [8] hours of protection against mosquitoes • Provides protection for up to 10 [8] hours against mosquitoes • Protects against mosquitoes for up to 10 [8] hrs • Repels mosquitoes for up to 10 [8] hrs • 10 [8] Hr Protection Against Mosquitoes • Repels Mosquitoes that may Carry West Nile Virus • Repels Mosquitoes and other Biting Insects • CONTAINS DEET [n, n-Diethyl-m-toluamide] • [Contains] 25% DEET • 25% DEET Formula • Resists perspiration • Water resistant [formula] • Water resistant [sports formula] • Sweat resistant [formula] • [Non-greasy and] resists perspiration • For active families]

Active Ingredient:

DEET 25.0%

Other Ingredients 75.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION Read cautions on back

Net Wt 6 oz (170 g)

OPTIONAL MARKETING CLAIMS

[NOW... PLEASANT PROTECTION THAT'S EFFECTIVE FOR HOURS]

[NOW... LONG LASTING PROTECTION WITHOUT UNPLEASANT SCENT]

OPTION 1

Repel 25 is specially formulated to repel mosquitoes, ticks, biting flies, gnats, chiggers, fleas and no-see-ums. Repel 25 offers long-lasting protection that's never greasy or oily, and has no unpleasant odor.

OPTION 2

Repel 25 provides hours of protection from mosquitoes and biting flies. Also repels ticks, chiggers, no-see-ums, gnats, and fleas. Repel 25 offers long-lasting protection: it's not greasy and has no unpleasant odor.

OPTION 3

Repel 25 repels biting insects for hours. It is specially formulated to repel mosquitoes, ticks, biting flies, gnats, chiggers, fleas and no-see-ums. Repel 25 is never greasy or oily and has no unpleasant odor. Cutter Insect Repellent is also available in a convenient pump spray too.

OPTION 4

Repel 25 provides up to 10 [8] hours of protection from mosquitoes. It also repels biting flies, ticks, chiggers, fleas and no-see-ums. Cutter's unique formula is not greasy, won't stain, and has no unpleasant odor.

OPTION 5

LONG LASTING PROTECTION. Convenient, effective Repel 25 is now in an aerosol spray for quick coverage. You can spray from any angle, even upside down... to cover your arms, legs and back. It keeps you free from mosquitoes and other biting bugs for hours. Cutter Insect Repellent is also available in a convenient pump.]

ACCEPTED

March 28, 2013

Under the Federal Insecticide, Fungicide,
and Rodenticide Act, as amended, for the
pesticide registered under:

EPA. Reg. No: 305-51

Back Panel

SHAKE WELL BEFORE USING

STOP. Read and follow all directions and precautions on this product label.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. *For outdoor use only.*

Do not spray in enclosed areas. Hold can 6 - 8 inches from skin and clothing while spraying, keeping sprayer pointed away from face. Slightly moisten skin. Use just enough repellent to cover exposed skin and/or clothing. Do not use under clothing. [For maximum protection on skin, spread with hand after application.] Do not spray directly onto face. Spray on hands first, and then apply sparingly to face, avoiding eyes. Do not apply near eyes and mouth. Apply sparingly around ears. Do not apply over cuts, wounds or irritated skin. Do not apply to sunburned skin. Do not apply to children's hands. Do not allow children to handle this product. When using on children, apply to your own hands and then put it on the child. [For extra protection from [crawling] ticks, chiggers and fleas, spray along all openings of clothing, such as neckband, waistband, pant and sleeve cuffs, sock tops and other areas where insects may crawl under clothing.] [Frequent reapplication or saturation is unnecessary.] Avoid over-application of this product. After returning indoors, wash treated skin with soap and water [and double-check yourself, other family members and pets for ticks.] Wash treated clothing before wearing it again. Will not damage nylon, cotton, or wool. May damage some synthetic fabrics, plastics, watch crystals, leather, painted or varnished surfaces. Use of this product may cause skin reactions in rare cases. If you suspect reaction to this product, discontinue use, wash treated skin and call your local Poison Control Center. If you go to a doctor, take this product with you.

STORAGE AND DISPOSAL

Pesticide Storage: Store the product in a cool, dry place, out of reach of children.

Container Disposal: If empty: Do Not Puncture or Incinerate! Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION. Harmful if swallowed. Use of this product may cause skin reactions in rare cases. Wash treated clothing before wearing it again. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

First Aid

If Swallowed: Call a Poison Control Center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a Poison Control Center or doctor. Do not give anything by mouth to an unconscious person.

IF YOU SUSPECT A REACTION TO THIS PRODUCT: Discontinue use. Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a Poison Control Center or doctor for treatment advice.

HOTLINE NUMBER: In case of an emergency call toll free [1-800-767-9927].

Have the product container or label with you when calling a Poison Control Center or doctor, or going for treatment.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage

Physical or Chemical Hazards

FLAMMABLE. Contents under pressure. Keep away from heat, sparks, and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

NOTICE: To the extent consistent with applicable law buyer assumes all responsibility for safety and use not in accordance with directions.

Questions or Comments? Call 1-800-767-9927

[Contains NO CFC's or other ozone depleting substances. Federal regulations prohibit CFC propellants in aerosols.]

[Visit us on our web site at www.skeeterbites.com]

Made in the USA for Spectrum,
Division of United Industries Corporation,
PO Box 142642
St. Louis, MO 63114-0642

EPA Reg. No. 305-51

EPA Est No. 9688-MO-1

© 2012



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

MEMORANDUM:

From: Kevin Sweeney, Senior Entomologist

A handwritten signature in black ink, appearing to be "Kevin Sweeney", with a large checkmark to its right.

Date: March 27, 2013

Subject: PRODUCT PERFORMANCE DATA EVALUATION RECORD

DP barcode: 409244 and 407977

Decision no.: 470609 and 471849

Submission no: 925107 and 926662

Action code: R340

Product Name: Repel 25 and 25RTU

EPA Reg. No or File Symbol: 305-51 and 305-61

Formulation Type: RTU repellent

Ingredients statement from the label with PC codes: 25% DEET and 23% DEET (pc code 08301)

Application rate: cover area to be protected

Use pattern: skin applied insect repellent

OCSPP Guidelines: 810.37

I. Action Requested: Review one cited efficacy study.

II. Background: Products are citing data collected with EPA Reg. No. 121-68. Registrant wishes to add 8 hour protection claim.

III. Study Reviews

MRID44517601 Todd, R. 1998. Evaluation of the Efficacy of Topical Repellents against Mosquitoes in the Field.

Conclusion: This study is acceptable. The study was previously reviewed by Kevin Sweeney in 2004 (see attached) to support an 8 hour protection claim for a 23% DEET product. This product appears to be substantially similar to the two subject products based on a comparison of DEET content and inert ingredient levels and solvents used. The cited data can be bridged to support the proposed claim.

EFFICACY STUDY REVIEW

by Kevin J. Sweeney, Entomologist - IB

Kevin J. Sweeney
6/8/04

To: Joseph Tavano

Date: June 8, 2004

EPA Reg. No.: 121-34, 121-57; 121-59; 121-66; and 121-68

Product Name: 121-34 Cutter Original Insect Repellent Pump Spray Formula MMI

121-57 Cutter Insect Repellent #30CR

121-59 Cutter Insect Repellent #30ST

121-66 Cutter Insect Repellent #CTR014

121-68 Cutter Insect Repellent #CA23

Registrant: Spectrum - Division of United Industries Corporation

PM: Richard Gebken, Acting PM 10

Dec #: 328961; 331283; 331284; 328965; 3289864

DP : 296022; 295702; 295701; 295699; 295720

Chemical: DEET, insecticide (I) - repellent

121-34 23% DEET

121-57 30% DEET

121-59 30% DEET

121-66 30% DEET

121-68 23% DEET

Studies Submitted:

MRID # 44517601 Evaluation of the Efficacy of Topical Repellents Against Mosquitoes in the Field by ICR.

This study tested 121-68 and a product with an equal concentration of DEET to product 121-34 and 121-68. I previously reviewed this study in support in 8-hour repellency claims for 121-68 on April 21, 1998. I accepted the study for 8-hour repellency claims against mosquitoes only.

1. This study showed that the subject product provided complete protection against *Aedes* spp. saltmarsh mosquitoes for 11 hours. This repellency claim applies to mosquitoes only and does not support a repellency time for any other pest on the label. The study supports the claim for all of the subject products except 121-59 because water is not the predominant solvent in this formulation and therefore, it is not similar to the other products. For the submitted field study to support this product Chemsico must submit a lab study demonstrating similarity in terms of product performance for 121-68 and 121-59.

2. From my 1998 review: Delete the 8 hour claim for fleas, chiggers, ticks, biting flies and no-see-ums from the label. Efficacy data MUST be submitted or cited to support repellency claims for these pests. The data must prove the specified period of protection in hours. The old label (1994) has these pests on the label. Similar wording may be used but it should say "Repels" or "Provides protection against biting.....". The database for many of these pests, especially fleas, is lacking. However, this will be addressed during the DCI for DEET products.

Note that the data request for the above pests is still applicable when a PDCI is issued for product performance.

3. Regarding the notification submitted in late 2003 for the addition of the claim, "Repels mosquitoes that may carry/transmit West Nile virus", the registrant should cite or submit data showing the performance of the subject product against *Culex* spp. mosquitoes that transmit WNV to humans.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION
OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION (7505P)

FEE

BARCODE No.: 409242; DECISION No.: 470609 FILE SYMBOL No.: 305-51;
PRODUCT NAME: Repel 25; FOOD Use: No, PC CODE(s): 080301;
ACTION CODE: R340;

DATE: February 25, 2013

SUBJECT: Product Name: Repel 25

FROM: Akiva Abramovitch, Ph.D.
Technical Review Branch / RD (7505P)

THROUGH: Shyam Mathur, Ph.D.
Product Chemistry Team Leader
Technical Review Branch/RD (7505P)

SBur 02/27/13

TO: Carmen Rodia/Richard Gebken, PM 10
Insecticide Branch/ RD (7505C)

Company Name: United Industries
Formulation Type: Liquid Solution

INTRODUCTION:

The applicant has submitted an application for the basic and alternate CSFs revision of an end use product. In support of the formulation change, the registrant has submitted product chemistry data corresponding to guideline 830 series, group A & group B (MRIDs 489677-01 through -03). The revised basic CSF and the alternate formulation are both dated October 1, 2012. TRB has been asked to determine the acceptability of the product chemistry data and the proposed basic and alternate CSFs both dated October 1, 2012.

SUMMARY OF FINDINGS:

1. Name of Active Ingredient: Diethyl Toluamide (DEET) at 25.0 %
2. Has the registrant claimed substantial similarity to a registered product?
☐ Yes; ☒ No; if yes give the registration number of the cited product.
3. All the source materials for the active ingredients are derived from the registered sources:
☒ Yes; ☐ No.

BARCODE No.: 409242; DECISION No.: 470609 FILE SYMBOL/REG No: 305-51;
PRODUCT NAME: Repel 25; FOOD Use: No, PC CODE(s): 080301;

4. All inert ingredients have been screened by IAB and found to be approved for the proposed labeled uses: ☒ Yes; ☐ No.

5. Confidential Statement of Formula(s):

☒ Basic and alternate CSFs both dated October 1, 2012;

6. Product label

a. Ingredient statement: Nominal concentration of AI listed on CSF(s) concur with product label (PR Notice 91-2).

☒ Yes, if not, explain below:

Is the sub statement in compliance with PR Notice 97-6 (inert ingredient vs other ingredient)?

☒ Yes; ☐ No; if not, explain below:

Metallic equivalent: ☐ Yes ☒ NA;

Soluble arsenic: ☐ Yes ☒ NA

Isomeric ratios: ☐ Yes ☒ NA

Acid equivalent: ☐ Yes ☒ NA; {name} acid equivalent = xx %

b. Health related sub statements: Product contains?

Petroleum distillate at > 10%: ☐ Yes ☒ No ☐ NA

Methanol at > 4%: ☐ Yes ☒ No ☐ NA

Sodium nitrate/Sodium nitrite ☐ Yes ☒ No ☐ NA

c. Physical chemical hazard statement: Product label requires a statement per 40 CFR §156.78 for: flammability, explosive potential or electric insulator breakdown?

☒ Yes ☐ No

Is the sub statement in compliance with PR Notice 98-6 (Total Release Fogger)?

☒ Yes, ☐ No, ☐ NA, if not, explain below:

d. Label requires an additional Storage and Disposal statement:

☒ Yes ☐ No

Flammable (85.6 F Flash Point)

BARCODE No.: 409242; **DECISION No.:** 470609 **FILE SYMBOL No.:** 305-51;
PRODUCT NAME: Repel 25; **FOOD Use:** No, **PC CODE(s):** 080301;

7. Group A: Product Chemistry Data

TRB's determination of the acceptability for the proposed product is listed in the tables below.

Guideline No.	Study Title		Data submitted		TRB's Assessment of Data	MRID Nos.
			Yes	No		
830.1550	Product Identity & Composition		X		A	489677-01
830.1600	Description of materials used to produce the product		X		A	489677-01
830.1650	Description of formulation process		X		A	489677-01
830.1670	Discussion on the formation of impurities		X		A	489677-01
830.1700	Preliminary analysis			X	NA	
830.1750	Certified limits (158.350)	Standard certified Limits	X		A	489677-01
		Proposed Limits			NA	
		Justification for wider limits			NA	
830.1800	Enforcement analytical method		X		A	489677-03 (HPLC)

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver Request, I = In Progress, NA = Not Applicable; U = Upgradeable

BARCODE No.: 409242; **DECISION No.:** 470609 **FILE SYMBOL No.:** 305-51;
PRODUCT NAME: Repel 25; **FOOD Use: No., PC CODE(s):** 080301;

8. Group B:

Guideline No.	Study Title	Value or Qualitative Description	IRB's Assessment of Data	MRID Nos.
830.6303	Physical State	Opaque milky white liquid with a sweet alcohol odor	A	489677-02
830.6315	Flammability	85.6 F-Flammable	A	489677-02
830.6316	Explodability	NA, not considered to be potentially explosive	W	489677-02
830.7000	pH	8.85	A	489677-02
830.7300	Density (units)	0.9654 g/cm ³	A	489677-02

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver request,
NA = Not applicable, I = In progress, U = Upgradeable

BARCODE No.: 409242; **DECISION No.:** 470609 **FILE SYMBOL No.:** 305-51;
PRODUCT NAME: Repel 25; **FOOD Use:** No. **PC CODE(s):** 080301;
CONCLUSIONS:

TRB has reviewed the CSF(s) and product chemistry data for the proposed end use product and has concluded:

1. The proposed CSFs for the basic and alternate formulations both dated October 1, 2012 are acceptable
2. The data submitted corresponding to guidelines 830.1550 (product identity and composition), 830.1600 (description of materials used to produce the product), 830.1650 (description of formulation process), 830.1670 (discussion on the formation of impurity), 830.1750 (certified limits), and 830.1800 (enforcement analytical method) are acceptable.
3. The product chemistry data/waivers submitted corresponding to guidelines 830.6302 (color), 830.6303 (physical state), 830.6304 (odor), 830.6314 (oxidation/reduction), 830.6315 (flammability), 830.6316 (explodability), 830.7000 (pH), 830.7100 (viscosity), and 830.7300 (density) are acceptable.
4. The storage stability (guideline 830.6317) and corrosion characteristics (guideline 830.6320) studies were not submitted and will be conducted. These physical/chemical properties are required and it is recommended that observations should be made at 0, 3, 6, 9, and 12 month intervals.
5. The proposed label was screened as it pertains to the product chemistry requirements. Review of the proposed label and uses are the purview of the RM team.

**Recommendation of Division Directors
Negotiated Due Dates**

Decision #: 470609	Registration #: 305-51	Petition #:
<input checked="" type="checkbox"/> See page 2 for additional registration entries		
Chemical Name: DEET		
Fee Category: R340		PRIA Decision Time Frame: 6 weeks
Submitted by: Carmen	Rodia	Branch: OCSPP/OPP/RD/IB Date: 02/28/2013
Company: United Industries Corporation		
Original PRIA Due Date: 02/28/2013		Proposed New PRIA Due Date: 04/11/2013
Previous Negotiated Due Dates:		
Is the "Fix" in-house? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n/a		If not, date "Fix" expected:
Negotiated Due Date Reason:		
Additional Data Required	<input type="checkbox"/> Product Chemistry <input type="checkbox"/> Toxicology <input type="checkbox"/> Acute Tox <input type="checkbox"/> Environmental <input type="checkbox"/> Efficacy <input type="checkbox"/> Ecological <input type="checkbox"/> Residue <input type="checkbox"/> Other	
Data Deficiencies	<input type="checkbox"/> Product Chemistry <input type="checkbox"/> Acute Tox <input type="checkbox"/> Efficacy <input type="checkbox"/> Residue <input type="checkbox"/> Toxicology <input type="checkbox"/> Environmental <input type="checkbox"/> Ecological <input type="checkbox"/> Labeling <input type="checkbox"/> Other <input type="checkbox"/> Not Submitted	
Late Risk Assessment	<input type="checkbox"/> Human Health <input type="checkbox"/> Ecological	
Interim Consideration	<input type="checkbox"/> Agency Initiated <input checked="" type="checkbox"/> Registrant Initiated	
<input type="checkbox"/> CSF	<input type="checkbox"/> Public Process	<input type="checkbox"/> Risk Issues Environmental <input type="checkbox"/> Risk Issues Human Health
<input type="checkbox"/> Impurities Review	<input type="checkbox"/> Label	<input type="checkbox"/> Administrative-FR Notice <input type="checkbox"/> Other – Comment Field
Summary of Deficiency Type(s): <input type="checkbox"/> Not Submitted (N) <input type="checkbox"/> Deficiencies (D)		
Product Chemistry: <input type="checkbox"/> Acute Tox: <input checked="" type="checkbox"/> Efficacy: <input type="checkbox"/> Labeling: <input type="checkbox"/> Ecological Data: <input type="checkbox"/> Other (describe): <input type="checkbox"/>		
Describe Interactions with Company (describe when contacted and company's response including response to previous negotiated due dates): Please see comment #1 on page 2.		
"75 Day" Letter sent? <input type="checkbox"/> Yes, Date sent <input checked="" type="checkbox"/> No and reason for none? <i>Add comments on page 2</i>		
Rationale for Proposed Due Date: Please see comment #2 on page 2.		
Registrant notified that this is the last negotiation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not Applicable		
Approve: <input checked="" type="checkbox"/>		Disapprove: <input type="checkbox"/>
If disapproved, action to be taken:		
OD or DOD Signature: CN=Marty Monell/OU=DC/O=USEPA/C=US		Date: 03/01/2013

Decision #:	Registration #:	Petition #:

Issue(s) (describe in detail):

Comment(s):

1. Carmen Rodia conducted a phone call (on February 25, 2013) with United Industries Corporation (the registrant), regarding the need for the registrant to request a 6-week extension of the current PRIA conclusion date for the pending amendment that is under review for EPA Reg. No. 305-51 (Repel 25 Insect Repellent) in order to provide the Agency with additional time to complete a combined efficacy review required for this pending amendment as well as the amendment for EPA Reg. No. 305-61 (Repel 25 RTU Insect Repellent), another United Industries Corporation insect repellent product.

2. On February 25, 2013, Carmen Rodia spoke with Jessica Goldberg (United Industries Corporation) to discuss the need for additional time (6 weeks) in order for the Agency to subsequently complete the combined efficacy review required for this pending amendment as well as the amendment for EPA Reg. No. 305-61 (Repel 25 RTU Insect Repellent). On February 27, 2013, United Industries Corporation submitted a 6 week extension request, which will change the existing PRIA conclusion date from February 28, 2013 to April 11, 2013.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

October 12, 2012

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

OPP Decision Number: D-470609
EPA File Symbol or Registration Number: 305-51
Product Name: REPEL 25
EPA Receipt Date: 09-Oct-2012
EPA Company Number: 305
Company Name: UNITED INDUSTRIES CORP.

JESSICA GOLDBERG
UNITED INDUSTRIES CORP.
D/B/A WPC BRANDS, INC.
PO Box 4406
BRIDGETON, MO 63044-

SUBJECT: Receipt of Registration Amendment Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your amendment and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R340

AMENDMENT;NON-FAST TRACK;REVIEW WITHIN RD, E.G. PRECAUTIONARY LABELING;

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-9362.

Sincerely,

A handwritten signature in black ink, appearing to be "m. z. k.", is written over the word "Sincerely,".

Front End Processing Staff
Information Technology & Resources Management Division



United States Environmental Protection Agency
Office of Pesticide Programs (493000)
Washington, D.C. 20460
Application for Pesticide



Registration
Amendment
Other

Chemical Identifier Number

Section II

31. Company/Product Number 305-81	32. Product Manager R. Gatten	33. Proposed Classification <input checked="" type="checkbox"/> Unrestricted <input type="checkbox"/> Restricted
34. Company/Product (Name) Page 25	35. EPA Reg. No. 10	36. Restricted Review. In accordance with FIFRA Section 2(c)(2) (a)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name: _____
37. Name and Address of Applicant (include ZIP Code) W.P. Bingham Inc. P.O. Box 406 Bridgeport, NJ 08443-0406 <input type="checkbox"/> Check if this is a new address		38. EPA Reg. No. _____ Product Name: _____

Section III

<input type="checkbox"/> Amendment - Explain below	<input type="checkbox"/> Final product label in response to Agency letter (date)
<input type="checkbox"/> Reevaluation in response to Agency letter (date)	<input type="checkbox"/> "New" Application
<input type="checkbox"/> Notification - Explain below	<input type="checkbox"/> Other - explain below

Explanation: (Use additional page(s) if necessary. (For section II and Section III))
Enclosed please find our application to revise the basic Confidential Statement of Formula and the alternate CAS# with an alternate source of active ingredient. We are also taking this opportunity to add additional marketing language to the label. The complete data reports are included with this submission. (Please see cover letter for details)

Section IV

39. Water in which this product will be packaged:			
40. Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	41. Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	42. Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	43. Types of Containers <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
44. Certification must be submitted	If "YES", Unit package wgt _____ No. per container _____	If "YES", Pkg wgt _____ No. per container _____	
45. Location of Net Content Information <input type="checkbox"/> Label <input type="checkbox"/> Container		46. Size(s) of Retail Container	47. Location of Label Directions <input type="checkbox"/> On label <input type="checkbox"/> On labeling accompanying product
48. Name(s) in which label is affixed to product <input type="checkbox"/> Unlabeled <input type="checkbox"/> Pre-labeled <input type="checkbox"/> Sealed		<input type="checkbox"/> Other _____	

Section V

50. Contact Point (Complete items directly below for identification of the individual to be contacted, if necessary, to process this application)		
Name Jessica Goldberg	Title Regulatory Affairs Specialist	Telephone No. (include Area Code) 202-261-3000
51. Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by the Commissioner of Health under applicable law.		52. Date Application Received (Stamp) October 2, 2002
53. Signature 		54. Title Regulatory Affairs Specialist
55. Typed Name Jessica Goldberg		56. Date October 2, 2002

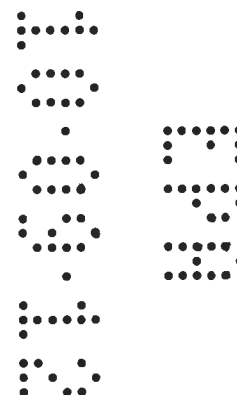
WPC Brands Inc.
P.O. Box 4406
Bridgeton, MO 63044-0406

October 3, 2012

Document Processing Desk (AMEND)
Office of Pesticide Programs
United States Environmental Protection Agency
Room S4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

Attention: Mr. Richard Gebken
Product Manager Team 10

Subject: **Application for Amendment**
Repel 25
EPA Reg. No. 305-51



Dear Mr. Gebken:

Enclosed please find our application for an amendment of the subject product, which is an aerosol insect repellent product for use outdoors. The amendment intends to revise the basic Confidential Statement of Formula and file an alternate CSF with an alternate source of active ingredient. We are also taking this opportunity to add optional marketing language to the label. In support of this application, we are submitting product chemistry data, an analytical method and citing efficacy to support the optional marketing language. We are citing six acute toxicity studies. The complete data reports are included with this submission.

Under PRIA, we believe that this application falls into Category EPA No. R340, for which the fee applicable is \$3,617. A copy of the pre-payment receipt is attached as proof of pre-payment of the service fee.

The following documents are enclosed in support of this submission:

1. Application for Pesticide (EPA Form 8570-1)
2. Formulator's Exemption Statement
3. Certification with Respect to Citation of Data electing the selective method
4. A Data Requirement Listing Matrix, summarizing all data being submitted and/or referenced in support of this application (both Public file copy and Agency use copy)
5. Two (2) copies of Confidential Statement of Formula for Repel 25 (designated *Revised Basic*)
6. Two (2) copies of Confidential Statement of Formula for Repel 25 (designated *Alt 1*)
7. Five (5) copies of labeling for the proposed product.

The previous items are bound together as Volume 1. The following studies are also enclosed, three copies of each bound separately and designated as follows:

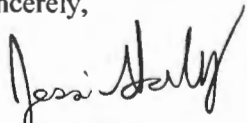
Volume 2. Physical and Chemical Properties Determination Repel 25 (Revised Basic Formula) EPA Reg. No. 305-51, Product Properties Test Guidelines Group B, Physical/Chemical Properties OPPTS 830.6302 -> 830.6321 (Series 63, Subdivision D), United Industries Corp., Lab Study No. 12-09-01-UI

Volume 3. Product Identity & Disclosure of Ingredients and Analysis and Certification of Product Ingredients Repel 25 (Revised Basic Formula), Product Properties Test Guidelines OPPTS Group A, Product Identity, Composition and Analysis, Author Paul L. Schoenberg, United Industries Corp.

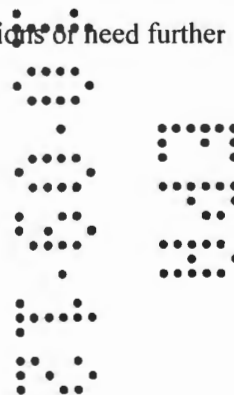
Volume 4. Determination of N, N-Diethyl-m-toluamide (DEET) Content in Certain Pesticide Formulations (UILC 125.00), Data Requirement Guideline 158.180, Performing Laboratory; United Industries Corp.

Please call me at 314-683-2438 or via email: jessica.goldberg@spectrumbrands.com, if you have questions or need further information. Thank you in advance for your time.

Sincerely,



Jessica Goldberg
Regulatory Affairs Specialist



WPC Brands Inc.
P.O. Box 4406
Bridgeton, MO 63044-0406

October 3, 2012

Document Processing Desk (AMEND)
Office of Pesticide Programs
United States Environmental Protection Agency
Room S4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

Attention: Mr. Richard Gebken
Product Manager Team 10

Subject: Application for Amendment
Repel 25
EPA Reg. No. 305-51

Dear Mr. Gebken:

Enclosed please find our application for an amendment of the subject product, which is an aerosol insect repellent product for use outdoors. The amendment intends to revise the basic Confidential Statement of Formula and file an alternate CSF with an alternate source of active ingredient. We are also taking this opportunity to add optional marketing language to the label. In support of this application, we are submitting product chemistry data, an analytical method and citing efficacy to support the optional marketing language. We are citing six acute toxicity studies. The complete data reports are included with this submission.

Under PRIA, we believe that this application falls into Category EPA No. R340, for which the fee applicable is \$3,617. A copy of the pre-payment receipt is attached as proof of pre-payment of the service fee.

The following documents are enclosed in support of this submission:

1. Application for Pesticide (EPA Form 8570-1)
2. Formulator's Exemption Statement
3. Certification with Respect to Citation of Data electing the selective method
4. A Data Requirement Listing Matrix, summarizing all data being submitted and/or referenced in support of this application (both Public file copy and Agency use copy)
5. Two (2) copies of Confidential Statement of Formula for Repel 25 (designated *Revised Basic*)
6. Two (2) copies of Confidential Statement of Formula for Repel 25 (designated *Alt 1*)
7. Five (5) copies of labeling for the proposed product.

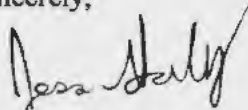
The previous items are bound together as Volume 1. The following studies are also enclosed, three copies of each bound separately and designated as follows:

Volume 2. Physical and Chemical Properties Determination Repel 25 (Revised Basic Formula) EPA Reg. No. 305-51, Product Properties Test Guidelines Group B, Physical/Chemical Properties OPPTS 830.6302 -> 830.6321 (Series 63, Subdivision D), United Industries Corp., Lab Study No. 12-09-01-UI

- *Volume 3.* Product Identity & Disclosure of Ingredients and Analysis and Certification of Product Ingredients Repel 25 (Revised Basic Formula), Product Properties Test Guidelines OPPTS Group A, Product Identity, Composition and Analysis, Author Paul L. Schoenberg, United Industries Corp.
- Volume 4.* Determination of N, N-Diethyl-m-toluamide (DEET) Content in Certain Pesticide Formulations (UILC 125.00), Data Requirement Guideline 158.180, Performing Laboratory; United Industries Corp.

Please call me at 314-683-2438 or via email: jessica.goldberg@spectrumbrands.com, if you have questions or need further information. Thank you in advance for your time.

Sincerely,



Jessica Goldberg
Regulatory Affairs Specialist



United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address

WPC Brands Inc
P.O. Box 4406
Bridgeton, MO 63044-0406

EPA File Symbol/Registration Number

305-51

Product Name

Repel 25

Date of Confidential Statement of Formula (EPA Form 8570-4)

October 1, 2012

As an authorized representative of the applicant for registration of the product identified above, I certify that:

- (1) This product contains the following active ingredient(s):

DEET (CAS # 134-62-3)

- (2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be labeled.

- (3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF.

- (4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
N,N-Diethyl-m-toluamide	[REDACTED]	[REDACTED]
Product ingredient source information may be entitled to confidential treatment		
Signature <i>Jessica Goldberg</i>	Name and Title Jessica Goldberg, Regulatory Affairs Specialist	Date October 3, 2012



United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address

WPC Brands Inc
P.O. Box 4406
Bridgeton, MO 63044-0406

EPA File Symbol/Registration Number

305-51

Product Name

Repel 25

Date of Confidential Statement of Formula (EPA Form 8570-4)

October 1, 2012

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

DEET (CAS # 134-62-3)

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be labeled.

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source

Active Ingredient	Product Name	Registration Number
N,N-Diethyl-m-toluamide		
Product ingredient source information may be entitled to confidential treatment		
Signature	Name and Title	Date
	Jessica Goldberg, Regulatory Affairs Specialist	October 3, 2012



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number WPC Brands Inc, P.O. Box 4406, Bridgeton, MO 63044-0406	EPA Registration Number/File Symbol 305-51
Active Ingredient(s) and/or representative test compound(s) DEET	Date October 3, 2012
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Outdoor Use	Product Name Repel 25

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
--	---

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

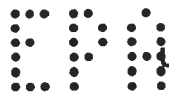
I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date 10/3/2012	Typed or Printed Name and Title Jessica Goldberg, Regulatory Affairs Specialist
---------------	-------------------	--



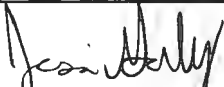
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date	October 3, 2012	EPA Reg. No./File Symbol	305-51	Page	1	of	4
Application's/Registrant/s Name & Address		Product					
WPC Brands Inc, P.O. Box 4406, Bridgeton, MO 63044-0406		Repel 25					
Ingredient Deet (CAS # 134-62-3)							
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note		
Section 158.190	Product Chemistry						
61-1 (830.1550)	Chemical Identity	See CSF					
61-2 (830.1650)	Beginning Material & Manufacturing Process	Submit 10/3/12	Chemsico, Div of United Industries Corp	OWN			
61-3 (830.1670)	Discussion of formation of impurities	Submit 10/3/12	Chemsico, Div of United Industries Corp	OWN			
62-1 (830.1700)	Preliminary analysis	N/A	N/A	FOR			
62-2 (830.1750)	Certification of limits	see CSF					
62-3 (830.1800)	Analytical method for enforcement limits	Submit 10/3/12	Chemsico, Div of United Industries Corp	OWN			
63-2 (830.6302)	Color	Submit 10/3/12	Chemsico, Div of United Industries Corp	OWN			
63-3 (830.6303)	Physical state	Submit 10/3/12	Chemsico, Div of United Industries Corp	OWN			
63-4 (830.6304)	Odor	Submit 10/3/12	Chemsico, Div of United Industries Corp	OWN			
63-5	Melting point	N/A	N/A- Not required for end use products	FOR			
63-6	Boiling point	N/A	N/A- Not required for end use products	FOR			
63-7 (830.7300)	Density, bulk-density or specific gravity	Submit 10/3/12	Chemsico, Div of United Industries Corp	OWN			
63-8	Solubility	N/A	N/A	FOR			
63-9	Vapor pressure	N/A	N/A	FOR			
Signature 			Name and Title Jessica Goldberg, Regulatory Affairs Specialist		Date October 3, 2012		



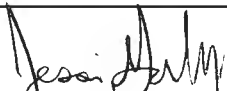
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

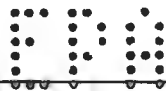
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date	October 3, 2012	EPA Reg. No./File Symbol	305-51	Page	2	of	4
Application's/Registrant's Name & Address		Product					
WPC Brands Inc. P.O. Box 4406, Bridgeton, MO 63044-0406		Repel 25					
Ingredient Deet (CAS # 134-62-3)							
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note		
Section 158.190	Product Chemistry						
63-10	Dissociation Constant	N/A	N/A	FOR			
63-11	Octanol/water partition coefficient	N/A	N/A	FOR			
63-12 (830.7000)	pH	Submit 10/3/12	Chemsico, Div. Of United Industries Corp.	OWN			
63-13	Stability	N/A	N/A- Not required to be submitted	FOR			
63-14 (830.6314)	Oxidizing/reducing reaction	Submit 10/3/12	Chemsico, Div. Of United Industries Corp.	OWN			
63-15 (830.6315)	Flammability	Submit 10/3/12	Chemsico, Div. Of United Industries Corp.	OWN			
63-16 (830.6316)	Explosibility	Submit 10/3/12	Chemsico, Div. Of United Industries Corp.	OWN			
63-17 (830.6317)	Storage stability	N/A	Chemsico, Div. Of United Industries Corp.	OWN	PR Notice 92-5		
63-18 (830.7100)	Viscosity	N/A	Chemsico, Div. Of United Industries Corp.	OWN			
63-19 (830.6319)	Miscibility	N/A	N/A	N/A	Not mixed with oil		
63-20 (830.6320)	Corrosion characteristics	N/A	Chemsico, Div. Of United Industries Corp.	OWN			
63-21 (830.6321)	Dielectric breakdown voltage	N/A	Not intended for use around electrical equipment.	N/A			
Signature 		Name and Title				Date	
		Jessica Goldberg, Regulatory Affairs Specialist				October 3, 2012	



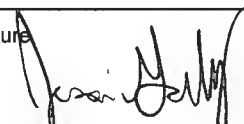
10-09-12

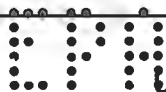
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460 Do not send the form to this address.

DATA MATRIX

Date October 3, 2012		EPA Reg. No./File Symbol 305-51		Page 3 of	
Application's/Registrant/s Name & Address WPC Brands Inc, P.O. Box 4406, Bridgeton, MO 63044-0406		Product Repel 25			
Ingredient Deet (CAS # 134-62-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Section 158.340	Toxicology				
81-1	Acute Oral LD-50, rat	45031002	Chemsico, Div. Of United Industries Corp	OWN	
81-2	Acute Dermal LD-50	45031003	Chemsico, Div. Of United Industries Corp	OWN	
81-3	Acute Inhalation, LC-50, rat	45040902	Chemsico, Div. Of United Industries Corp	OWN	
81-4	Primary Eye Irritation, rabbit	45030701	Chemsico, Div. Of United Industries Corp	OWN	
81-5	Primary Dermal Irritation	45030401	Chemsico, Div. Of United Industries Corp	OWN	
81-6	Dermal Sensitization	45031005	Chemsico, Div. Of United Industries Corp	OWN	
81-7	Acute Delayed Neurotoxicity- Hen	N/A	Not an organophosphate		
Signature 			Name and Title Jessica Goldberg, Regulatory Affairs Specialist		Date October 3, 2012

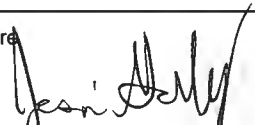


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date October 3, 2012		EPA Reg. No./File Symbol 305-51		Page 4 of 4	
Application's/Registrant's Name & Address WPC Brands Inc, P.O. Box 4406, Bridgeton, MO 63044-0406		Product Repel 25			
Ingredient Deet (CAS # 134-62-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Section 158.640-Supplementary	Spero, N. (1997) Evaluation of the Efficacy of Topical Repellents Against Mosquitoes in the Field: Lab Project Number: 042-0032: N0420597001A115. Unpublished study prepared by Insect Control & Research, Inc. 89p.	4451760I	Chemsico, Div. of United Industries Corp	OWN	
Signature 			Name and Title Jessica Goldberg, Regulatory Affairs Specialist		Date October 3, 2012

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.

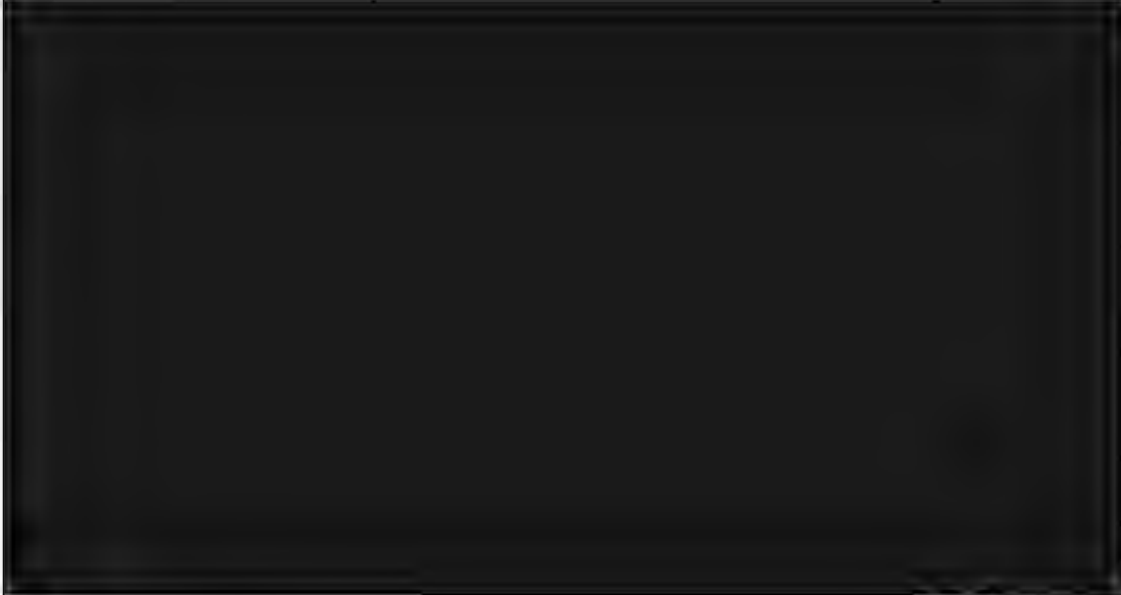
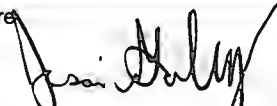


WASHINGTON, D.C. 20460



Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2157) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460 Do not send the form to this address.

DATA MATRIX

Date October 3, 2012		EPA Reg. No./File Symbol 305-51		Page 4 of 4	
Application's/Registrant/s Name & Address WPC Brands Inc, P.O. Box 4406, Bridgeton, MO 63044-0406		Product Repel 25			
Ingredient Deet (CAS # 134-62-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Chemsico, Div. Of United Industries Corp	OWN	
Signature 			Name and Title Jessica Goldberg, Regulatory Affairs Specialist		Date October 3, 2012

Front Panel

Repel 25

Insect Repellent

(either in name or stated separately)

[Unscented • Long lasting protection • From mosquitoes, ticks, biting flies, gnats, chiggers, no-see-ums and fleas • Makes you invisible to bugs • It won't stain • Not greasy or oily • Makes You Invisible to Bugs • Tough on bugs • Effective, dependable protection • Pleasant, effective protection • Repels mosquitoes, chiggers, ticks, biting flies, no-see-ums, gnats and fleas • Repels biting insects for hours • Pleasant, effective protection from mosquitoes, chiggers, ticks, biting flies, no-see-ums, gnats and fleas • with Extender • Lasts up to 10 [8] hours against mosquitoes • Provides up to 10 [8] hours of protection against mosquitoes • Provides protection for up to 10 [8] hours against mosquitoes • Protects against mosquitoes for up to 10 [8] hrs • Repels mosquitoes for up to 10 [8] hrs • 10 [8] Hr Protection Against Mosquitoes • Repels Mosquitoes that may Carry West Nile Virus • Repels Mosquitoes and other Biting Insects • CONTAINS DEET [n, n-Diethyl-m-toluamide] • [Contains] 25% DEET • 25% DEET Formula • Resists perspiration • Water resistant [formula] • Water resistant [sports formula] • Sweat resistant [formula] • [Non-greasy and] resists perspiration • For active families]

Active Ingredient:

DEET	25.0%
Other Ingredients	75.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION Read cautions on back

Net Wt 6 oz (170 g)

OPTIONAL MARKETING CLAIMS

[NOW . . . PLEASANT PROTECTION THAT'S EFFECTIVE FOR HOURS!]

[NOW . . . LONG LASTING PROTECTION WITHOUT UNPLEASANT SCENT]

OPTION 1

Repel 25 is specially formulated to repel mosquitoes, ticks, biting flies, gnats, chiggers, fleas and no-see-ums. Repel 25 offers long-lasting protection that's never greasy or oily, and has no unpleasant odor.

OPTION 2

Repel 25 provides hours of protection from mosquitoes and biting flies. Also repels ticks, chiggers, no-see-ums, gnats, and fleas. Repel 25 offers long-lasting protection: it's not greasy and has no unpleasant odor.

OPTION 3

Repel 25 repels biting insects for hours. It is specially formulated to repel mosquitoes, ticks, biting flies, gnats, chiggers, fleas and no-see-ums. Repel 25 is never greasy or oily and has no unpleasant odor. Cutter Insect Repellent is also available in a convenient pump spray too.

OPTION 4

Repel 25 provides up to 10 [8] hours of protection from mosquitoes. It also repels biting flies, ticks, chiggers, fleas and no-see-ums. Cutter's unique formula is not greasy, won't stain, and has no unpleasant odor.

OPTION 5

LONG LASTING PROTECTION. Convenient, effective Repel 25 is now in an aerosol spray for quick coverage. You can spray from any angle, even upside down . . . to cover your arms, legs and back. It keeps you free from mosquitoes and other biting bugs for hours. Cutter Insect Repellent is also available in a convenient pump.]

Back Panel

SHAKE WELL BEFORE USING

STOP. Read and follow all directions and precautions on this product label.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. *For outdoor use only.*

Do not spray in enclosed areas. Hold can 6 - 8 inches from skin and clothing while spraying, keeping sprayer pointed away from face. Slightly moisten skin. Use just enough repellent to cover exposed skin and/or clothing. Do not use under clothing. [For maximum protection on skin, spread with hand after application.] Do not spray directly onto face. Spray on hands first, and then apply sparingly to face, avoiding eyes. Do not apply near eyes and mouth. Apply sparingly around ears. Do not apply over cuts, wounds or irritated skin. Do not apply to sunburned skin. Do not apply to children's hands. Do not allow children to handle this product. When using on children, apply to your own hands and then put it on the child. [For extra protection from [crawling] ticks, chiggers and fleas, spray along all openings of clothing, such as neckband, waistband, pant and sleeve cuffs, sock tops and other areas where insects may crawl under clothing.] [Frequent reapplication or saturation is unnecessary.] Avoid over-application of this product. After returning indoors, wash treated skin with soap and water [and double-check yourself, other family members and pets for ticks.] Wash treated clothing before wearing it again. Will not damage nylon, cotton, or wool. May damage some synthetic fabrics, plastics, watch crystals, leather, painted or varnished surfaces. Use of this product may cause skin reactions in rare cases. If you suspect reaction to this product, discontinue use, wash treated skin and call your local Poison Control Center. If you go to a doctor, take this product with you.

STORAGE AND DISPOSAL

Pesticide Storage: Store the product in a cool, dry place, out of reach of children.

Container Disposal: If empty: Do Not Puncture or Incinerate! Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS**Hazards to Humans and Domestic Animals**

CAUTION. Harmful if swallowed. Use of this product may cause skin reactions in rare cases. Wash treated clothing before wearing it again. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

First Aid

If Swallowed: Call a Poison Control Center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a Poison Control Center or doctor. Do not give anything by mouth to an unconscious person.

IF YOU SUSPECT A REACTION TO THIS PRODUCT: Discontinue use. Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a Poison Control Center or doctor for treatment advice.

HOTLINE NUMBER: In case of an emergency call toll free [1-800-767-9927].

Have the product container or label with you when calling a Poison Control Center or doctor, or going for treatment.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage

Physical or Chemical Hazards

FLAMMABLE. Contents under pressure. Keep away from heat, sparks, and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

NOTICE: To the extent consistent with applicable law buyer assumes all responsibility for safety and use not in accordance with directions.

Questions or Comments? Call 1-800-767-9927

[Contains NO CFC's or other ozone depleting substances. Federal regulations prohibit CFC propellants in aerosols.]

[Visit us on our web site at www.skeeterbites.com]

Made in the USA for Spectrum,
Division of United Industries Corporation,
PO Box 142642
St. Louis, MO 63114-0642

EPA Reg. No. 305-51

EPA Est No. 9688-MO-1

© 2012